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Attorneys for Plaintiffs,

Michelle Conley; and, Ronald Conley

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**MICHELLE CONLEY; AND
RONALD CONLEY,**

Plaintiffs,

v.

**NCC BUSINESS SERVICES,
INC.; EQUIFAX
INFORMATION SERVICES
LLC; EXPERIAN
INFORMATION SOLUTIONS,
INC.; AND, TRANS UNION
LLC,**

Defendant.

Case No.: 16-cv-00115 JAH (JLB)

**JOINT MOTION TO DISMISS
DEFENDANT TRANS UNION LLC
WITHOUT PREJUDICE
PURSUANT TO FED. R. CIV. P.
41(A)**

HON. JOHN A. HOUSTON

1 Plaintiffs MICHELLE CONLEY; and, RONALD CONLEY (“Plaintiffs”)
2 and Defendant TRANS UNION LLC (“Trans Union”), by and through their
3 undersigned counsel, respectfully submit this Joint Stipulation for Dismissal
4 pursuant to Rule 41(a)(1) of the Federal Rule of Civil Procedure.

5 Plaintiffs and Trans Union hereby jointly stipulate to dismiss Trans Union
6 without prejudice.

7
8 Dated: March 9, 2016

Respectfully submitted,

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10 **KAZEROUNI LAW GROUP, APC**

11 By: /s/ Matthew M. Loker
12 MATTHEW M. LOKER, ESQ.
13 ATTORNEY FOR PLAINTIFFS

14 **MUSICK, PEELER & GARRETT LLP**

15 By: /s/ Donald E. Bradley
16 DONALD E. BRADLEY, ESQ.
17 ATTORNEY FOR TRANS UNION

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19 **SIGNATURE CERTIFICATION**

20 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
21 and Procedures Manual, I hereby certify that the content of this document is
22 acceptable to all defense counsel, and that I have obtained their authorization to
23 affix electronic signatures to this document.

24 Dated: March 9, 2016

KAZEROUNI LAW GROUP, APC

25
26 By: /s/ Matthew M. Loker
27 MATTHEW M. LOKER, ESQ.
28 ATTORNEY FOR PLAINTIFF